

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law  
100 Lafayette Street, Suite 501  
New York, NY 10013

Franklin A. Rothman  
Jeremy Schneider  
Robert A. Soloway  
David Stern

Tel: (212) 571-5500  
Fax: (212) 571-5507

Rachel Perillo

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
Paul G. Gardephe, U.S.D.J.

**Dated:** October 16, 2020

**By ECF**

Hon. Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Mousa Shahin  
20 Cr. 541 (PGG)

Dear Judge Gardephe:

I represent Mousa Shahin in the above-referenced matter. Yesterday, Mr. Shahin made his initial appearance before Magistrate Judge Sarah L. Cave and pleaded guilty to Counts One, Two and Three of the instant information. He was released pursuant to a \$150,000 personal recognizance bond to be co-signed by one financially responsible person, and as part of his bail conditions, his travel is restricted to the Southern and Eastern District of New York.

This letter is respectfully submitted without objection from pretrial services or the government to request a temporary modification of Mr. Shahin's travel restrictions to permit travel to the District of New Jersey for the purpose of playing in the final two games of his soccer season, which will take place over the next two Sundays in Patterson, New Jersey. As requested by PTSO Francesca Piperato, Mr. Shahin will provide his pretrial services officer with his game schedule and the precise field location.

If the Court has any questions regarding this application, please contact my office.

Respectfully submitted,

/s/

David Stern

cc: AUSA George Turner (by ECF and Email)  
USPTO Francesca Piperato (by Email)